

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

JOINT MOTION FOR IMPOUNDMENT

Pursuant to Local Rule 7.2 and paragraph 14 of the Court’s Protective Order, plaintiff ScanSoft, Inc. (“ScanSoft”) and defendant Voice Signal Technologies, Inc. (“Voice Signal”) hereby jointly move for an order granting leave to file under seal each party’s post-hearing memorandum concerning Voice Signal’s Motion to Disqualify Goodwin Procter LLP (the “Memoranda”).

As grounds for this motion, the parties state that the Memoranda discuss, quote and attach documents that are relevant to the Motion to Disqualify. These documents have been designated by defendant as “Confidential” pursuant to the Protective Order. Furthermore, the Memoranda address testimony which was ordered protected by the Court at the outset of the hearing on Voice Signal’s Motion to Disqualify Goodwin Procter LLP.

WHEREFORE, the parties jointly move for leave to file the Memoranda, and their attached exhibits, under seal in a supplied envelope and that impoundment continue pursuant to Local Rule 7.2 and the terms of the Protective Order.

Respectfully submitted,

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Richard C. Abati

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Sarah Chapin Columbia (BBO No. 550155)
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Assented,

SCANSOFT, INC.

By its attorneys,

/s/ Daniel M. Forman

Paul F. Ware Jr., P.C. (BBO No. 516240)
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Boston, MA 02109
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Dated: March 23, 2006

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for the parties conferred in an effort to resolve the issues presented in this motion, and that counsel for each party assents thereto.

/s/ Richard C. Abati

CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to the registered participants in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 23, 2006.

/s/ Richard C. Abati